

MWG:SP/DIB  
F. #2024R00401

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
----- X

UNITED STATES OF AMERICA

- against -

KEITH BRADY,

Defendant.

----- X

**FILED UNDER SEAL**

COMPLAINT AND AFFIDAVIT  
IN SUPPORT OF APPLICATION  
FOR AN ARREST WARRANT

(18 U.S.C. § 922(g)(1) and 3551 et seq.)

24-MJ-474

EASTERN DISTRICT OF NEW YORK, SS:

AMANDA BAKER JORQUERA, being duly sworn, deposes and states that she is a special agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”), duly appointed according to law and acting as such.

On or about March 2, 2024, within the Eastern District of New York and elsewhere, the defendant KEITH BRADY, knowing that he had been previously convicted in a court of one or more crimes punishable by a term of imprisonment exceeding one year, did knowingly and intentionally possess in and affecting commerce a firearm, to wit: one 9mm Sig Sauer semiautomatic pistol with serial number 66F341795.

(Title 18, United States Code, Sections 922(g)(1) and 3551 et seq.)

The source of your deponent’s information and the grounds for her belief are as follows:<sup>1</sup>

---

<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. I am a special agent with ATF and have been involved in the investigation of numerous cases involving the recovery of firearms and ammunition. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation. Where I describe the statements of others, I am doing so only in sum and substance and in part.

2. On or about March 2, 2024, at approximately 12:30 a.m., New York City Police Department ("NYPD") officers observed that a Mercedes-Benz vehicle (the "Vehicle") driving with excessively tinted windows near Flatlands Avenue and East 108th Street in Brooklyn, New York. Based on their observation of this traffic violation, the officers decided to pull over the Vehicle.

3. The driver of the Vehicle was the defendant KEITH BRADY's brother, Terrell Brady, and KEITH BRADY was seated in the front passenger seat of the Vehicle.

4. NYPD officers approached the driver's side window and spoke with Terrell Brady. The officers asked Terrell Brady, on multiple occasions, to provide them with a form of identification. Terrell Brady refused to provide a form of identification and began screaming at the officers. The officers then arrested Terrell Brady.

5. Having arrested the driver of the Vehicle, the officers subsequently impounded the Vehicle and brought it back to the 69th Precinct where, hours later, they conducted an inventory search of the Vehicle pursuant to procedures set forth in the NYPD Patrol Guide.

6. During the inventory search of the Vehicle, the officers found inside the glove box a 9mm Sig Sauer semiautomatic pistol with serial number 66F341795 (the “Firearm”) and approximately seventeen rounds of ammunition inside a magazine.

7. Inside the glove box with the Firearm and ammunition were numerous documents, including a New York State Department of Motor Vehicles Pre-Licensing Course Completion Certificate in the name of “Keith Brady.”

8. The Firearm was then seized and processed by members of the NYPD Evidence Collection Team (“ECT”). An ECT officer swabbed the Firearm for DNA by applying swabs to various areas of the Firearm, including the frontstrap, backstrap, and side grips; the slide grip grooves, slide release, and magazine release; and the trigger and trigger guard. Those swabs were submitted to the Office of Chief Medical Examiner (“OCME”) for DNA analysis.

9. According to reports created by the OCME, an individual identified as “Male Donor A” was a contributor to the following DNA samples: (a) a three-person mixture of DNA recovered from a swab of the frontstrap, backstrap, and side grips of the Firearm; and (b) a three-person mixture of DNA recovered from a swab of the slide grip grooves, slide release, and magazine release of the Firearm.

10. In addition, according to the same reports created by the OCME, Terrell Brady was also a contributor to the three-person mixture of DNA recovered from a swab of the slide grip grooves, slide release, and magazine release of the Firearm.<sup>2</sup>

---

<sup>2</sup> On July 9, 2024, a grand jury sitting in the Eastern District of New York returned an indictment charging Terrell Brady with one count of possession of a firearm, to wit: the Firearm, having previously been convicted of a felony, in violation of 18 U.S.C. § 922(g)(1). See United States v. Terrell Brady, No. 24-280 (WFK) (E.D.N.Y.).

11. The OCME has since determined that Male Donor A is the defendant KEITH BRADY.<sup>3</sup>

12. I have reviewed KEITH BRADY's criminal history. On or about June 4, 1998, a jury found BRADY guilty of robbery in the second degree, in violation of New York Penal Law § 160.10, in Kings County Supreme Court. KEITH BRADY was later sentenced to an indeterminate term of 18 to 36 months' imprisonment.

13. I have conferred with an interstate expert from the ATF, who has informed me, in sum and substance and in part, that the Firearm was manufactured outside the State of New York.

14. It is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the application and arrest warrant. The defendant KEITH BRADY is currently at liberty, and disclosure of the papers submitted in support of this application would give the defendant an opportunity to change patterns of behavior and flee from or evade prosecution, and would therefore have a significant and negative impact on the continuing investigation and may severely jeopardize its effectiveness.

---

<sup>3</sup> KEITH BRADY's DNA was on file as an Offender Specimen in the New York State DNA Index System. This Offender Specimen was taken in 2000 when KEITH BRADY was in the custody of the New York State Department of Corrections and Community Supervision. I have confirmed that the defendant KEITH BRADY is the "Keith Brady" of this Offender Specimen based on his name, date of birth, and New York State Identification Number.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued for the defendant KEITH BRADY, so that he may be dealt with according to law.

/s/ Amanda Baker Jorquera  
AMANDA BAKER JORQUERA  
Special Agent  
ATF

Sworn to before me by telephone this  
\_\_\_ day of July, 2024 July 23, 2024

  

---

THE HONORABLE SANKET J. BULSARA  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK